

Debtor 1 Jeffrey T. Rees

Debtor 2 Jennifer L. Rees fka Jennifer L. Ludwig
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of Pennsylvania
(State)

Case number 19-23273-GLT

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V Court claim no. (if known): 17-1

Last 4 digits of any number you use to identify the debtor's account: 4568

Property address: 302 Aprilmae Way
Number Street

Pittsburgh PA 15237
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 11 / 01 / 2024
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

 / /
MM / DD / YYYY

Debtor 1 Jeffrey T. Rees Case number (if known) 19-23273-GLT
First Name Middle Name Last Name

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Lauren M. Moyer
Signature

Date 12 / 12 / 2024

Print Lauren M. Moyer Title _____
First Name Middle Name Last Name

Company Friedman Vartolo LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 1325 Franklin Avenue, Suite 160
Number Street

Garden City NY 11530
City State ZIP Code

Contact phone (212) 471 - 5100

Email bankruptcy@friedmanvartolo.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Jeffrey T. Rees & Jennifer L. Rees *fka* : Bankruptcy No.: 19-23273-GLT
Jennifer L. Ludwig, :
Debtor : Chapter 13
: :
Rushmore Servicing as servicer for U.S. :
Bank National Association, not in its : Related to Document No.
individual capacity but solely as trustee :
for RMTP Trust, Series 2021 Cottage-TT- :
V :
: Hearing Date and Time:
: :
v. :

Jeffrey T. Rees
Jennifer L. Rees fka Jennifer L. Ludwig
Ronda J. Winnecour
Respondents

CERTIFICATE OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on December 12, 2024.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: December 12, 2024

By: /s/ Lauren M. Moyer,
Lauren M. Moyer, Esq
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Service by Regular Mail

Jeffrey Rees
302 Aprilmae Way
Pittsburgh, PA 15237
Bankruptcy Debtor

Jennifer Rees
302 Aprilmae Way
Pittsburgh, PA 15237
Bankruptcy Co-Debtor

Service by NEF

Kenneth Steidl
Suite 2830 Gulf Tower
707 Grant Street
Pittsburgh, PA 15219
Attorney

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street,
Pittsburgh, PA 15219
Bankruptcy Trustee

Office of the United States Trustee
1000 Liberty Avenue,
Suite 1316
Pittsburgh, PA 15222
United States Trustee